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Planning Corporation, System Planning
Corporation, d/b/a/ Globaltrak, and
Richard C. Meyers

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

IMPEVA, LABS, INC.,

Plaintiff,

vs.

SYSTEM PLANNING
CORPORATION, SYSTEM
PLANNING CORPORATION D/B/A
GLOBALTRAK, AND RICHARD C.
MEYERS

Defendants.

Civil Action No. 5:12-cv-00125-EJD

**~~PROPOSED~~ ORDER TO EXTEND
TIME FOR CASE MANAGEMENT
CONFERENCE AND RELATED
DATES**

IT IS HEREBY STIPULATED by and between the parties hereto pursuant to Local Rules 17-12, and with the approval of this Court, that the ADR deadlines be extended from their original noticed date based upon the following:

WHEREAS, in accordance with the Local Rules, the Court has scheduled the hearing for the Case Management Conference ("CMC") for April 27, 2012;

WHEREAS, Defendants previously had filed a motion to dismiss the complaint herein. The hearing for which was scheduled for April 27, 2012 and, in response thereto, Plaintiff filed its First Amended Complaint on or about February

22, 2012 and, thereafter, filed its Opposition to the Motion to Dismiss on or about February 29, 2012. Thereafter, the parties requested to continue the CMC and related dates but were advised by the Court that with the filing of the First Amended Complaint rendered the motion to dismiss ineffective and the parties should reassess the status of this matter (Dkt. No. 22);

WHEREAS, Defendants have now filed their motion to dismiss the First Amended Complaint under F.R.C.P. 12(B)(1) and 12(B)(6) and the hearing on such motion remains on April 27, 2012;

WHEREAS it is the parties belief that the Court's Order on Defendants' motion will have an impact upon the scope of this case including, but limited to, the application of this Court's local patent rules to this action in the event that the Court grants or denies the motion with respect to Plaintiff's causes of action for declaratory relief as to non-infringement and invalidity of the patents of Defendant System Planning Corporation;

Accordingly, the parties believe that to conserve judicial resources the CMC should be continued so as to permit this Court to rule on Defendants' motion and, thereafter, allow the parties to prepare for the CMC based upon this Court's ruling;

The parties therefor respectfully requested that the ADR, and related deadlines be revised as set forth below.

Event	Original Date	New Date
CMC	April 27, 2012	June 1, 2012
ADR Deadlines	April 6, 2012	May 13, 2012
Rule 26(f) Report;		
Initial Disclosures; and		
File Case Management	April 20, 2012	May 26, 2012
Statement.		

1 IT IS SO STIPULATED.

2
3 DATED: March 30, 2012

MICHAEL E. DERGOSITS
IGOR SHOIKET
DERGOSITS & NOAH LLP

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7 By: /s/ Michael E. Dergosits
8 Michael E. Dergosits
9 Attorneys for Plaintiff Impeva Labs, Inc.

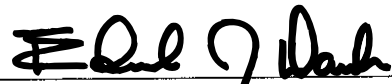
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11 DATED: March 30, 2012

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13
14 By: /s/ Thomas S. Kiddé
15 Thomas S. Kiddé
16 Attorneys for Defendants System Planning
17 Corporation, System Planning Corporation,
18 d/b/a/ Globaltrak, and Richard C. Meyers

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20 GOOD CAUSE APPEARING, IT IS ORDERED that the CMC and ADR
21 deadlines be extended as set forth in the above Stipulation.

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23
24 Dated: April 3, 2012



Honorable Edward J. Davila,
U.S. District Court Judge